In The Matter Of:

ELIZABETH BECKLEY vs.
CITY OF ATLANTA, GEORGIA

LAWRENCE JETER
November 17, 2016
30(b)(6) DEPOSITION

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

_____

ELIZABETH BECKLEY,

        Plaintiff,

        vs.

CITY OF ATLANTA, GEORGIA,

        Defendant.

CIVIL ACTION

FILE NO.
1:16-cv-01435-MHC

_____

RULE 30(b)(6) DEPOSITION OF

CITY OF ATLANTA, GEORGIA by

LAWRENCE JETER

Thursday, November 17, 2016
10:09 a.m.

55 Trinity Avenue, S.W.
Suite 5000
Atlanta, Georgia

Jennifer Goodrich, RPR, CCR-5084-0657-3249-3312

APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

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On behalf of the Defendant:

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    (Original Exhibits 1 through 3 have been attached to the original transcript.)

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 1              (Reporter disclosure made pursuant to

 2         Article 10.B of the Rules and Regulations of the

 3         Board of Court Reporting of the Judicial Council

 4         of Georgia.)

 5              MR. RADFORD:  This will be the deposition

 6         taken of the City of Atlanta pursuant to Rule

 7         30(b)(6) of the Federal Rules of Civil Procedure,

 8         in the case of Elizabeth Beckley verus the City

 9         of Atlanta, Georgia.  Currently pending in the

10         US District Court for the Northern District of

11         Georgia.  This deposition is taken pursuant to

12         notice.

13              My name is James Radford, I'm the attorney

14         representing the plaintiff.  I'd ask the witness,

15         sir, if you could please identify your name for

16         the record.

17              MR. JETER:  Yes.  Lawrence Jeter,

18         J-e-t-e-r.

19              MR. RADFORD:  And, Mr. Jeter, are you an

20         employee of the City of Atlanta?

21              MR. JETER:  Yes.

22              MR. RADFORD:  And tell me, what is your

23         position?

24              THE WITNESS:  I'm a public works senior

25         manager for the Department of Public Works;
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1   Office of Transportation.

2   LAWRENCE JETER,

3   having been first duly sworn, was examined and

4   testified as follows:

5   CROSS-EXAMINATION

6   BY MR. RADFORD:

7   Q.   And, sir, not that it's a controversial

8   issue, but now that you've taken the oath can I ask

9   you to identify your position with the City of

10   Atlanta?

11   A.   Senior public works manager in the

12   Department of Public Works; Office of Transportation.

13   Q.   Okay. And are you aware that you've been

14   designated by the City of Atlanta to represent the

15   City's position on a number of issues that we've

16   requested that the City speak on today?

17   A.   Yes.

18   (Plaintiff's Exhibit 1 was marked for

19   identification.)

20   Q.   (By Mr. Radford) I'm going to show you

21   what I'm going to mark as Plaintiff's Exhibit 1, which

22   is a copy of what's called the 30(b)(6) notice that we

23   served on the City. And I guess take a brief moment

24   to look at this and tell me if you recognize it.

25   A.   Yes, I do.

1   Q.   This is something you've seen before?

2   A.   Yes.

3   Q.   Okay. If you look at Page 2 there are six

4   topics that we've put in here and we've asked the City

5   to designate someone to speak on these topics. Have

6   you reviewed these topics?

7   A.   Yes, I have.

8   Q.   And are you prepared to speak on these

9   topics today?

10   A.   Yes.

11   Q.   Now just in a general sense, can you tell

12   me what sort of preparation you've done for your

13   deposition today?

14   A.   Yes. I reviewed documents on storage

15   drives. I've reviewed aerial maps about the subject

16   location. I've talked to some additional staff about

17   any issues concerning -- excuse me -- concerning the

18   intersection in question. And that's about it.

19   Q.   Okay. You said you looked at some

20   documents on storage drives, what documents did you

21   look at?

22   A.   Yes. Some tracking spreadsheets dealing

23   with our ADA construction activities.

24   Q.   Can you describe a little bit more detail

25   what that is.

1   A.   Yes. There are documents that were

2   generated as a result of a consent decree of 2009

3   where we were required to identify locations we had

4   resurfaced since 1992. And that document listed all

5   of those locations since then and it has additional

6   analytical information about total mileage, number of

7   streets, some other data.

8   Q.   And you said it's a spreadsheet document?

9   A.   Yes, it is.

10   Q.   Have you seen it in paper form or just in

11   electronic form?

12   A.   Just in electronic form, I didn't print it

13   out.

14   Q.   Okay. And where did you go to access that

15   document?

16   A.   We have an old storage drive. That

17   storage drive served our old Quality of Life Bond

18   Program. That program is now defunct. Is has been

19   renamed our Capital Projects Division, but that

20   server, storage drive, is still accessible.

21   Q.   And where did you go to actually view the

22   document?

23   A.   I accessed it from my office.

24   Q.   Okay. Do you actually have a copy of it

25   on some sort of drive in your possession?

     1   A.   No, I don't.

     2   Q.   How did you access it from your office?

     3   A.   Yeah, my laptop is mapped to the location

     4   of the server.

     5   Q.   So you have remote access to the server?

     6   A.   Yes.

     7   Q.   Okay. Did you have to have a password or

     8   anything?

     9   A.   Well, other than our initial sign on

    10   password, no.

    11   Q.   Do you know if that's something that's

    12   pubically accessible?

    13   A.   No.

    14   Q.   And I asked the question in a bad way. Is

    15   that something that's publically accessible?

    16   A.   Okay. I don't believe so no.

    17   Q.   You don't believe so?

    18   A.   No.

    19   Q.   Other than that spreadsheet, did you

    20   review any documents?

    21   A.   Yes, the questions concerning this

    22   deposition. I reviewed some other information in my

    23   position dealing with ADA ramps. And I researched

    24   some aerial photos that I accessed from my laptop.

    25   Q.   You said you researched some other info

1   that you had on ADA ramps, what is that?

2   A.   Yes. I currently manage our Pavement

3   Preservation Program, I have done so since 2013. As

4   part of that program a component to that is looking at

5   ADA compliance issues for projects associated with

6   resurfacing activities.

7   Q.   And was there some information in there

8   that informed what you would be talking about today?

9   A.   Yes. It listed the projects that we had

10   done since 2013 to date. And it also -- it was the

11   primary spreadsheet we used to do our assessments to,

12   you know, confirm whether or not there are some ADA

13   issues we need to address.

14   Q.   And those are in your possession?

15   A.   Yes.

16   Q.   The aerial photos, what aerial photos did

17   you look at?

18   A.   Well, I looked at -- I accessed two sites.

19   First site I looked at was Google maps and the

20   historical maps. They dated back to I believe 2007.

21   I was able to look at the intersection from the aerial

22   photos. Also looked at Fulton County's GIS maps.

23   They actually went back to 2000. So --

24   Q.   Okay. So I'm kind of jumping around a

25   little bit. When you looked at these maps, did it

1   appear that that intersection has been lacking in

2   sidewalk ramps all the way going back to 2000?

3   A.   There were no sidewalk ramps at that

4   intersection dating all the way back to 2000, yes.

5   Q.   Did that surprise you at all?

6   A.   No.

7   Q.   Why doesn't it surprise you?

8   A.   Because the area that we're looking at is

9   actually an intersection of two bridges. And the

10   bridge -- the bridges were built, I believe, they're

11   70-years-old. I consulted a bridge engineer about the

12   age of the bridges.

13   Q.   Okay. You said you had talked to some

14   additional staff, who did you talk to?

15   A.   One being Michael Ayo; he's our bridge

16   engineer.

17   Q.   Spell the last name for me.

18   A.   His last name is spelled, A-y-o.

19   Q.   Ayo?

20   A.   Yeah, Ayo.

21   Q.   He's a bridge engineer?

22   A.   Yeah, he's the department's primary bridge

23   engineer.

24   Q.   Okay. Anyone else you spoke with to

25   prepare for today other than your attorney?

1   A.   Some additional staff members who had been

2 involved originally with completing some of the work,

3 the ADA ramp work. And, you know, just asking

4 questions about where some of the data was. I believe

5 I talked to one of the field engineers who was

6 involved in the actual work. The name is

7 Geoffrey Stevens.

8   Q.   On that particular intersection or --

9   A.   No, no. Just the whole data set from the

10 research I did on our storage drive. Of those

11 intersections where we had ramps -- where we were

12 supposed to prepare ramps since 2009.

13   Q.   So you talked with him about some other

14 ramps that were installed since?

15   A.   No. I was just trying to get some

16 additional information about those ramps, were they

17 completed, you know, how the work progress.

18   Q.   So you talked with him about ramps that

19 actually were installed?

20   A.   Right.

21   Q.   So Michael Ayo. Any other specific names

22 of people you recall speaking with?

23   A.   I believe, yes, Angela Campbell.

24   Q.   Who is that?

25   A.   She works in our Commission's Office and

1   she researches records for the Commission's Office.

2   Q.   And what commissioner are you referring

3   to?

4   A.   The Department of Public Works

5   Commissioner. He's our department head.

6   Q.   For City of Atlanta?

7   A.   Yes.

8   Q.   Anyone else you recall speaking with

9   specifically?

10   A.   No. I tried to contact additional staff,

11   but they were not available.

12   Q.   Okay. So as far as anyone who you had any

13   kind of substantive conversation with to prepare for

14   today that would be Michael Ayo and Angela Campbell?

15   A.   Yes.

16   Q.   So other than what we've talked about

17   already, are there any other records or any other

18   individuals who you consulted or reviewed for purposes

19   of preparing for your deposition today?

20   A.   No.

21   Q.   All right. I want to go into some of the

22   specific questions in here or topics.

23   A.   Sure.

24   Q.   The first topic we asked to have testimony

25   on is the City's policies and procedures for receiving

1   and responding to requests for installation of

2   sidewalk curb ramps as contemplated by the 2009

3   settlement agreement between the City and the

4   Department of Justice.

5   First question with respect to that: Are

6   you in general familiar with what we're referring to

7   by the 2009 settlement agreement between the City and

8   the Department of Justice?

9   A.   Yes.

10   Q.   And can you describe what that is for the

11   record.

12   A.   Well, the 2009 settlement agreement

13   identified deficiencies in our ADA ramps, facilities,

14   services. And the City was required to do an

15   assessment and develop a plan to address those

16   deficiencies. There were several components, one

17   dealing with facilities like I mentioned earlier,

18   services, sidewalks.

19   Q.   Do you have any awareness of how that

20   agreement came about? Was there litigation, was there

21   something that led to a settlement agreement that you

22   know of?

23   A.   I do not know how that agreement came

24   about.

25   Q.   Okay. But it's your understanding that

1   the City is bound by that agreement; is that fair to

2   say?

3   A.   Yes.

4   Q.   All right. Let me ask you just kind of

5   broadly: What are the City's policies and procedures

6   for receiving and responding to requests for

7   installation of sidewalk curb ramps?

8   A.   Well, primarily the City receives all our

9   requests via our customer service 311 system that's

10   tied to our work management system heads.

11   In the work management system requests for

12   repairs to sidewalks is inclusive of ADA ramps. ADA

13   ramps are considered an integral component of

14   repairing sidewalks. So those requests will come to

15   the department via our management system.

16   Q.   And if I was a person in a wheelchair that

17   wanted a curb ramp to be installed, how would I find

18   that 311 system?

19   A.   Well, it's noted on our web page. It's

20   accessible on the website.

21   Q.   Okay. I think I have access to the WiFi

22   here. What is the web address for that?

23   A.   Atlantaga.gov.

24   Q.   So if I were to go to that website, where

25   would I find the -- I can't find it right now. But if

1   I were to go to the Atlanta.ga website, how would I

2   find specifically what you're talking about?

3   A.   It should pop up on a screen on the

4   initial page, and you can also access it via the

5   Department of Public Works. There's a drop down menu

6   and various departments are identified and you should

7   be able to access it via one of those drop down menus,

8   via department along with some other additional

9   things.

10   Q.   Is there any sort of form or grievance

11   procedure specifically aimed towards the ADA

12   compliance?

13   A.   No.

14   Q.   So what you're talking about is sort of a

15   form or a request that would generally apply to

16   requests for sidewalks repair?

17   A.   Yes.

18   Q.   Like if the sidewalk in front of my house

19   was broken out by branches, there's some kind of form

20   I could request a repair to that?

21   A.   Yes, you could request a service request.

22   As I mentioned earlier, we consider sidewalk ADA ramps

23   an integral component to sidewalk construction. So

24   you can ask for an ADA repair via that same problem

25   code that tracks those requests.

1   Q.   Okay. It's the same form basically?

2   A.   Yes.

3   Q.   The form for the sidewalk is broken up by

4 branches, is the same way I would go to say a sidewalk

5 doesn't have a ramp --

6   A.   Correct.

7   Q.   -- so I can't get up on it in my

8 wheelchair?

9   A.   Correct.

10   Q.   And is there any kind of separate

11 grievance procedure for ADA noncompliance with respect

12 to sidewalk access?

13   A.   No.

14   MR. RADFORD: It looks like I'm still not

15   able to -- there's a law guest, do you know if

16   there's a password for that?

17   MS. FLOYD: I do not. I'm sorry.

18   MR. RADFORD: Okay. Can we find out?

19   MS. FLOYD: Let me see if I can e-mail

20   someone about that.

21   MR. RADFORD: Let's go off the record.

22   (Recess from 10:27 a.m. to 10:29 a.m.)

23   Q.   (By Mr. Radford) So for the record, I've

24 got pulled up on my laptop here the City of Atlanta

25 website, Atlantaga.gov. Have I truly and accurately

1   pulled up the City of Atlanta website?

2   A.   Yes, that's the City of Atlanta website.

3   Q.   Okay. So how would I find on this website

4   what you're talking about, the place to request or

5   repair a sidewalk?

6   A.   Okay. It usually scrolls through --

7   Q.   What if I look up public works in the

8   search bar? Try that?

9   A.   Well, yeah, you can.

10   Q.   Let's see if that gets us there. City of

11   Atlanta Public Works.

12   A.   Yeah.

13   Q.   And you can scroll on your own if you want

14   to.

15   A.   Yeah. Hit the residence.

16   Q.   Residence.

17   A.   Let's see what --

18   Q.   So we've clicked on the tab residence.

19   A.   I'm just --

20   Q.   Sure. Go ahead. So you clicked on City

21   Hall and then another tab that says online services.

22   A.   Right. And scroll back up for me. Can

23   you go back up in the search and type 311.

24   Q.   So I'm going up to the search bar and

25   typing 311?

1   A.   Yeah.

2   Q.   Okay.

3   A.   Atl311. I don't know why they don't give

4 you a --

5   Q.   Well, let's try the Public Works page

6 again. Here's Atl311.com.

7   A.   Yeah.

8   Q.   So I'm going to Atl311.com which is a link

9 off of the public works page on the Atlanta website.

10   A.   Okay. It should list several sections you

11 can go in. I think one says streets and sidewalks.

12   Q.   I'll go in the search bar and search for

13 sidewalks on the Atl311.com webpage.

14   So that's taking a while to load, but as

15 we're looking at the main page it looks like a

16 specific link that says sidewalk defects?

17   A.   Right.

18   Q.   So I'm clicking that. While we're waiting

19 for this to load --

20   A.   Okay.

21   Q.   -- is there any place where data would be

22 compiled as to requests that have from come through

23 this website?

24   A.   Yes. There's a way we can pull the data

25 out. All requests go in and they're assigned a

 1   problem code. And most street and sidewalk problem

 2   codes start with ST. And I think the specific code

 3   for sidewalk is ST-930. And then we've got some other

 4   ones ST-931 which is larger sidewalk repairs.

 5   Q.   So ST-930 --

 6   A.   Is the primary problem code that's used to

 7   track those defects or request for services.

 8   Q.   Request for sidewalk repairs?

 9   A.   Uh-huh.

10   Q.   And then ST-931 would be another code?

11   A.   Yeah, I believe that one -- that's to

12   request for larger sidewalk repairs.

13   Q.   Okay. Is there any code specifically

14   designated for lack of wheelchair access?

15   A.   No.

16   Q.   Has there been any efforts to publicize

17   this website and this process to people who might need

18   wheelchair access to let them know that this is how

19   they would go about filing a grievance?

20   A.   I am not aware of any PSAs or advisories

21   specific to those type of requests.

22   Q.   Okay. And one reason I ask, I mean, kind

23   of in my own research, you know as we were working on

24   this case, we went on Google and, you know, looking

25   for the form that I would use to request, you know, a

1   sidewalk ramp be repaired or notify the City that

2   there's no sidewalk access at a certain intersection

3   and there's not anything.

4   And I just want to be sure there's not

5   something out there that I don't know of. But as far

6   as you know that's accurate, there's not been anything

7   that's labeled as this is how a person in a wheelchair

8   would request a sidewalk ramp be put in at a given

9   sidewalk?

10   A.   That's correct.

11   Q.   But as an internal matter, you all would

12 find out about it if they went through this Atl311

13 website?

14   A.   That's correct.

15   Q.   Okay. And this could be a problem with my

16 phone or it could be a problem with the -- but just

17 for the record we've clicked on a link of Atl311 that

18 relates to sidewalk repair requests. And it says the

19 page isn't working. But, again, that could be just

20 because we're having trouble with the connection and

21 we can check that out later.

22   Okay. And this Atl311 this website and

23 this process for requesting sidewalk repairs, how long

24 has this process been in place?

25   A.   The 311 process is a fair ly new step in

1 customers being able to access services to the City.

2 I think within the last two to three years the 311

3 call center or that number, 311, was activated. But

4 the work management system that this information feeds

5 into has -- we have used that system 10, 15 years. I

6 mean --

7   Q.   Okay. So the internal work management

8 system has been around for 10 or 15 years, but I guess

9 the means for the public to communicate that to the

10 City has only been around for two to three years?

11   A.   Well, the specific 311 system. We've had

12 other methods. I believe it was previously called

13 customer service call center. You know, we've also

14 had -- the departments had their internal customer

15 service divisions. But with this administration the

16 mayor chose to centralize it into a centralized call

17 center.

18   (Plaintiff's Exhibit 2 was marked for

19   identification.)

20   Q.   (By Mr. Radford) I'm going to show you

21 what I'm going to mark as Plaintiff's Exhibit 2. I'll

22 represent to you that this is a copy of the 2009

23 settlement agreement that I got from the Department of

24 Justice website. Take as much time as you need to

25 review it. And let me know if there's something about

1   it that makes you think it's not an accurate copy.

2   And you can see on the very bottom of the page the

3   government website it was accessed from.

4   A.   Okay.

5   Q.   And are you familiar with this document?

6   A.   Yes, I am.

7   Q.   And I know it's a long document, but based

8   on what you've been able to see from your brief

9   review, does it appear to be an accurate copy of the

10   2009 settlement agreement?

11   A.   It does.

12   Q.   And if you'll turn to Page 6, on the

13   bottom it says 6/12 on the bottom. You see at the

14   very bottom of that page it says sidewalks?

15   A.   Yes.

16   Q.   So the next Page 7 is where the actual

17   agreement with relation to sidewalks begins. And

18   that's Paragraphs 36 through 40.

19   A.   Uh-huh.

20   Q.   All right. So I want to take a look at

21   Paragraph 36 specifically which provides: "Within

22   three months of the effective date of this agreement,

23   the City will implement and report to the Department

24   its written process for soliciting and receiving input

25   from persons with disabilities regarding the

1 accessibility of its sidewalks, including, for

2 example, requests to add curb cuts at particular

3 locations."

4   Now from what I understand, at least

5 present day, there is no specific written process for

6 requests for wheelchair ramps outside of the sort of

7 general 311 system for sidewalk repairs, correct?

8   A.   Correct.

9   Q.   And do you know if there ever was any

10 written process for soliciting and receiving input

11 from persons with disabilities regarding the

12 accessibility of sidewalks?

13   A.   I do not.

14   Q.   Have you ever seen any kind of written

15 process that would meet that description?

16   A.   I have not.

17   Q.   Let me ask you this question: So through

18 the 311 process on the website or from whatever

19 existed prior to 311, do you have any record of how

20 many requests have come from persons specifically

21 complaining that there was not a sidewalk

22 accessibility accomodation in a given place within the

23 City?

24   A.   Could you repeat that?

25   Q.   Yeah, I made that too complicated. I'm

1   going to talk about sidewalk ramps because that's the

2   most obvious accessibility accomodation, right?

3   A.   All right.

4   Q.   So either from the new 311 system or

5   through whatever proceeded that, do you have any

6   record of how many requests have come from people to

7   the City of Atlanta for installation of sidewalk

8   ramps?

9   A.   No, I don't.

10   Q.   I asked you the question if you had any

11   record of that, do you know how many requests have

12   come through?

13   A.   No, I do not.

14   Q.   How would we find that out?

15   A.   Through a search of our Hansen work

16   management system, specifically the product code

17   ST-930. You would have to review those specific

18   requests. And then once an inspection is completed,

19   the field comments are in there as well as any

20   associated work orders that were eventually performed

21   as a result of that service request.

22   Q.   Okay. So because there's no specific code

23   for wheelchair ramps, you would have to go into sort

24   of the subcategory of sidewalk repairs and then search

25   within those to see, I guess, just based on the

 1   comments and things which ones related to wheelchair

 2   access?

 3   A.   That's correct.

 4   Q.   And have you done that for purposes of

 5   this deposition today?

 6   A.   I did not.

 7   Q.   Okay. Could you give me a ballpark

 8   average, how many requests under ST-930 or ST-931 have

 9   been made since let's say -- you said the system went

10   into place about three years ago -- so since that 311

11   system went into place, can you give me an estimate as

12   to about how many requests you've gotten?

13   A.   I could give you a better estimate as

14   to -- we get these weekly reports about the numbers of

15   requests coming in. I know currently we have 140

16   active ST-930 requests right now.

17   Q.   Okay.

18   A.   Generally that's how many -- we get -- I

19   think the last report I reviewed we got 20 requests in

20   on one day so --

21   Q.   Okay. So when you say 140, would those be

22   140 open files so to speak?

23   A.   Yeah, open unresolved.

24   Q.   Unresolved. Okay. So 140 pending now --

25   A.   Right.

```
 1        Q.      -- that have yet to be resolved?

 2        A.      Right.

 3        Q.      And then more that have been resolved?

 4        A.      Yes.

 5        Q.      Would you say thousands more?

 6        A.      I would say thousands.

 7        Q.      Would you say tens of thousands?

 8        A.      You said since --

 9        Q.      Since the 311 system went into place.

10        A.      At least a couple thousand.

11        Q.      Okay.  And this ranges anywhere from -- I

12   guess, I gave the example earlier, roots are coming up

13   and cracking the sidewalk, would that be included in

14   that?

15        A.      Yes, that would.

16        Q.      Or maybe the sidewalk is too narrow,

17   people complain about that?

18        A.      Yes.

19        Q.      Okay.  I can't remember the name of it,

20   but there's a phrase for when people park their cars

21   and they park it too far down on their driveway so

22   that they're blocking the sidewalk.

23        A.      Uh-huh.

24        Q.      Do you ever hear complaints about that?

25   It's called vonent parking or --
```

1   A.   I don't know the term.

2   Q.   Hold on one second. When I say it you may

3 recognize it. I think it's a term of art.

4   A.   Okay.

5   Q.   Well, I can't find the term. Would that

6 be something within your domain, I guess, the

7 complaints that people are parking and blocking

8 sidewalk access?

9   A.   No. That would probably come via a --

10 come through our inspection permits group.

11   Q.   Code enforcement?

12   A.   Right, code enforcement.

13   Q.   From your personal knowledge or based on

14 the materials you've reviewed for today, do you have

15 any estimate of how many complaints have come through

16 that system specifically with respect to the question

17 of wheelchair access?

18   A.   No.

19   Q.   Do you know if any have come through about

20 wheelchair access?

21   A.   No. I'd have to answer no to that.

22   Q.   And, no, none have or no you don't know?

23   A.   I don't know.

24   Q.   Would it be that type a thing where you

25 get the whole data set and you can do control F and

1   find and look for the word wheelchair and find

2   complaints that relate to that?

3   A.   Yes.   Let me correct one additional thing.

4   I did talk to one additional person about the

5   accessing data when I was trying to review a set.   And

6   that was Pierre Johnson, he's our Director of

7   Performance Management.   And he indicated to me that

8   we can probably download the data and then do a word

9   search to identify specific records related to any ADA

10   issues.   This was late yesterday.   So I just recalled

11   it.

12   Q.   Okay.   And so prior to the 311 system

13   being in place when there was just sort of a customer

14   service approach, is there a database or record set

15   generated through that process similar to what we have

16   with the current 311 system?

17   A.   Yes.   We've had multiple work management

18   systems in the department.   We've used a file maker

19   pro database to track those requests similar -- I

20   mean, the data flow -- that data came into Hansen so

21   the structure was the same so we could query based on

22   problem codes.

23   Q.   All right.   If we go back to Exhibit 1,

24   the 30(b)(6) notice.   The second topic we've asked the

25   City to designate a witness on is the number of and

1   the details of all requests for installation of

2   sidewalk curb ramps as contemplated by the 2009

3   settlement.

4   Are you prepared to answer questions about

5   that?

6   A.   So this question is specific to curb

7   ramps?

8   Q.   Yes, sir.

9   A.   New requests?

10   Q.   Right.

11   A.   My answer to that is I don't have the

12 number of -- it would require extensive research

13 across maybe five different divisions to ascertain all

14 the new requests or installations of sidewalk and

15 sidewalk curb ramps since the 2009 settlement.

16   Q.   Okay. When you say you have to look

17 across five different divisions --

18   A.   Yes, sir.

19   Q.   -- what different divisions would you have

20 to --

21   A.   We have a -- the old Quality of Life Bond

22 Program was reprogrammed as a Capital Projects

23 Division; so that's one division. They do a number of

24 sidewalk projects.

25   Q.   So you call it Capital Bonds?

     1   A.   Capital Projects Division.

     2   Q.   Projects Division. Okay.

     3   A.   They do a number of streetscape projects,

     4   sidewalk projects, funded via various methods; federal

     5   funding impact fees. So they should have -- they have

     6   constructed some new curb ramps and sidewalks.

     7   We have a new program called Renew

     8   Atlanta. That's our new bond program. They're

     9   constructing sidewalks, resurfacing streets, and

    10   performance streetscape projects along with repairs to

    11   other vertical infrastructure.

    12   There's a planning division in the Office

    13   of Transportation that reviews building permits for,

    14   you know, construction of sidewalk to ensure that

    15   they're compliant.

    16   We have our Operational Street Resurfacing

    17   Program, Pavement Preservation Program, that I

    18   specifically manage. And we also have our operational

    19   internal work crews who could be tasked with doing

    20   some of these new ramps and sidewalks as well.

    21   Q.   Okay. Does City of Atlanta have an ADA

    22   director or like an ADA office?

    23   A.   I don't think they have an ADA director.

    24   There was an ADA -- American Disability Acts

    25   coordinator I believe. And there was another

1   position, I can't recall the exact title but there

2   were two positions I think.

3   Q.   I keep saying do you know. Is there an

4   ADA coordinator today?

5   A.   I do believe so. That gentleman's name is

6   Billy Warner. He works in our -- he works in our --

7   it's the whole General Services Division.

8   Q.   So Billy Warner.

9   A.   Yeah. Office of Enterprise Asset

10   Management, OEAM.

11   Q.   Okay. And that's the ADA coordinator?

12   A.   Right.

13   Q.   And is that the chief man in the city for

14   ADA compliance issues?

15   A.   His task was to coordinate our reporting

16   requirements associated with that settlement agreement

17   across all the division, but I think specifically

18   since he manages our facilities he was responsible for

19   insuring that they were compliant in accordance with

20   the agreement.

21   Q.   Has he had any role with respect to

22   sidewalk access?

23   A.   Not outside the public right of way, I do

24   not think so.

25   Q.   What do you mean by that, not outside the

 1   public right of way?

 2   A.   The public right of way is the street

 3   sidewalk basic area. I think Bill's primary

 4   responsibility is public facilities. You know, so we

 5   try to keep the distinction between the public right

 6   of way and private property. In some private property

 7   cases it happens to be public property.

 8   Q.   Okay. I'm going off the radar for a

 9   second, but I've heard -- I can't find anything to

10   substantiate this, but in my research I've heard

11   people say that in City of Atlanta a homeowner is

12   responsible for the sidewalk in front of their home.

13   And if there's any damage to it they're responsible to

14   repair it and not the City.

15   A.   I can speak to that.

16   Q.   Tell me, is that true?

17   A.   Yes and no.

18   Q.   Okay.

19   A.   Yes, the City has a code Section 1-38-14,

20   which deal specifically with sidewalk maintenance.

21   And there's basically five subsections to that

22   ordinance. You know, one deals with maintenance --

23   removal of snow and ice, typical of people up North,

24   routinely they have to shovel snow.

25   Q.   And Atlanta nowadays.

```
 1      A.      True.   There's also a section that deals

 2  with maintenance of the grass strip if one is there.

 3  The homeowner is required to keep the grass cut, keep

 4  it filled, prune any plants in that area.

 5              If there is no grass strip the

 6  Commissioner has the discretion to pave the sidewalk

 7  all the way to the curb.  And then the maintenance is

 8  actually assigned to the abutting property owner upon

 9  notice from the department.  And once we determine

10  that the repairs were not responsible as a result of

11  some admissible function or utility company, public

12  trees, then that responsibility is assigned to the

13  property owner with a caveat.  And that caveat, if the

14  City has provided funding for the repairs then the

15  City will proceed with the repairs on a prioritized

16  basis until that funding is exhausted.  At that time,

17  once the funding is exhausted we revert back to the

18  property owner being responsibile.

19      Q.      Okay.  So does it sometimes happen that

20  someone will complain that the sidewalk in front of

21  their house is broken and they'll be told they

22  actually have to pay to repair?

23      A.      Yes, sometimes.

24      Q.      Is that 50 percent of the time, more than

25  50 percent of the time?
```

1   A.   Here lately zero percent of the time

2   because the City has provided funding over the last

3   few years to complete sidewalk repairs.

4   Q.   Okay.

5   A.   At least over the last two, three years.

6   Q.   Okay.

7   A.   So we haven't had to notice property

8   owners about their responsibility to make those

9   repairs.

10   Q.   And has there been a grant or some other

11   specific funding source that that money has come from?

12   A.   Well, there was a move by counsel to

13   provide funding for infrastructure, public

14   infrastructure. I don't recall the exact ordinance,

15   but it allocated a percent of the general budget for

16   public repairs. That could include sidewalks, it

17   could include signals, any public, you know,

18   infrastructure that might need repair. And we've been

19   fortunate enough to receive a substantial portion of

20   that money for sidewalk repairs.

21   Q.   Okay. So that funded sidewalk repairs, I

22   think you said from the last couple of years?

23   A.   Yes, the last couple of years. At least

24   two.

25   Q.   At least two?

1   A.   Yes.

2   Q.   And then prior to that, though, there were

3   often instances where the property owner would be

4   required to do the repairs themselves?

5   A.   There have been some instances. I believe

6   the last time we noticed property owners about the

7   responsibility to repair sidewalks was in 2013. But

8   prior to that I don't recall.

9   Q.   Have there been any instances where a

10   property owner was told that they had to install their

11   own handicapped accessibility?

12   A.   No, no. If a request for an ADA ramp came

13   in the City would install that at no expense to the

14   property owner.

15   Q.   Okay. Topic No. 3 on our 30(b)(6) notice

16   was: The City's policies and procedures for

17   identifying sidewalks that are not compliant with the

18   ADA.

19   I think we've already covered this. My

20   understanding is that would be done through currently

21   the 311 system and previously through the customer

22   service system, but there is no specific policy

23   directed towards requests for ADA compliance?

24   A.   That's right.

25   Q.   And to your knowledge there never has

1   been?

2   A.   To my knowledge, no.

3   Q.   No. 4 asks: The City's policies and

4   procedures for identifying streets, roads, and

5   highways that have been constructed or altered since

6   January 26, 1992, for purposes of the ADA compliance.

7   Tell me what are the City's policies and

8   procedures in that request?

9   A.   Well, initially as a result of the consent

10   decree the department was tasked with identifying all

11   streets that had been resurfaced since 1992. They

12   completed that assessment and identified, I believe, a

13   total of it was roughly about 740 streets that we had

14   completed some resurfacing activity from 1992 to

15   2000 -- to the year 2000.

16   And then from 2001 to 2009 they identified

17   another 793 streets where we needed to assess for ADA

18   compliance issues. All total I believe that was like

19   703 miles of roadway, which is about a little less

20   than -- a little more than about 44 percent of our

21   total network -- roadway network. Excuse me.

22   Q.   Is there a document or something that I

23   could look at and see what streets were identified in

24   there?

25   A.   Yes. The tracking spreadsheet that I

1   found will identify all of the actual street locations

2   and it has some other analytics. I just printed out

3   one copy so I could remember.

4   Q.   And you've got a document you're looking

5   at, can you tell me what that document is?

6   A.   Yeah. Well, this is just a summary page

7   abstract from that data set. I mean, with that many

8   records I just didn't have time to review them all.

9   But anyway, there was a summary page in one of the

10   work tabs so I pulled that out. And it has some

11   summary information about the number of ramps they

12   found. The number that the ADA ramps were compliant

13   and the number of ramps that were found to be

14   compliant and/or missing.

15   Now, there's some gaps in the data, some

16   years some of the fields are not filled. And that's

17   one of the reasons I talked to some of the field

18   engineers to get a better understanding of why these

19   gaps were. There's also a gap between 2010 and --

20   between the time 2010 to 2013. I took over the

21   Pavement Preservation Program in 2013. But from the

22   year 2010 to that date 2013, there was a gap in the

23   data.

24   I hadn't been able to ascertain why that

25   data -- I believe the previous management retired and

 1   it was assigned to a new person for that time period

 2   and they may have the data it just didn't get input in

 3   this spreadsheet.

 4   Q.   So you have records of I believe you said

 5   resurfacing between 19 --

 6   A.   '92 through the year 2009.

 7   Q.   2009. But you don't have any data of --

 8   A.   From 2010 to 2013.

 9   Q.   Okay.

10   A.   And I specifically have the data

11   associated from 2013 to date.

12   Q.   Okay. So the only thing we're missing as

13   far as you know is 2010 to 2013?

14   A.   Right.

15   Q.   So the data set from '92 to 2009, would

16   that include data with respect to resurfacing or new

17   roads, new sidewalks, repairs to roads or sidewalks

18   that were part of the 1996 Olympic games?

19   A.   Yes. Any roads that we resurfaced during

20   that time would have been included in that data set.

21   Q.   Okay. Do you know if there's any separate

22   record anywhere as to specific projects that were

23   carried out for the '96 Olympic games?

24   A.   I'm aware that the City created this

25   entity called CODA which managed those.

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 1        Q.        CODA, C-o-d-a?

 2        A.        Yeah, I don't remember what those acronyms

 3   are, but that is now a defunct agency.  And I don't

 4   know where the records are associated with that.  But

 5   they would have kept all the records associated with

 6   anything related to the Olympics.

 7        Q.        Okay.  Were you living in Atlanta around

 8   the time of the Olympics?

 9        A.        Yes, I was.

10        Q.        And in general would you agree that there

11   was a massive amount of construction and repair in the

12   downtown Atlanta area?

13        A.        Yes, I was involved in quite a bit.

14        Q.        Okay.  And they created something called

15   Centennial Olympic Park Drive, right?

16        A.        Correct.

17        Q.        Which is one of the roads we're talking

18   about in this case?

19        A.        Yes.

20        Q.        And that road was completely redone for

21   the Olympics, correct?

22        A.        Certain sections were, yes.

23        Q.        There was no Centennial Olympic Park Drive

24   prior to the Olympics, right?

25        A.        It was actually Techwood Drive prior to
```

1   that.

2   Q.   Okay. And that road was designed as a

3   main thoroughfare to help with the increase in people

4   coming into the city for the Olympics, correct?

5   A.   Correct. A lot of improvements were made

6   along certain sections of Techwood now Centennial

7   Olympic Park Drive, yes.

8   Q.   And given that, does it surprise you that

9   for that whole time that intersection, the

10   intersection with Centennial Olympic and MLK, that

11   there was never any sidewalk ramps installed there as

12   part of that work?

13   A.   No. As I mentioned earlier, Centennial

14   Olympic Park Drive when you cross Marietta Street, you

15   begin to ascend on a bridge and that bridge is

16   approximately 70-years-old. And when you get up to

17   the intersection of ML King and Centennial Olympic

18   Park that's the intersection of two bridges. So all

19   of that is aerial. And below that is what I think

20   they referred to as the gulch.

21   Q.   Okay. But what about that would make it

22   not surprising to you that that intersection wouldn't

23   have been made handicapped accessible as part of the

24   Olympic's construction?

25   A.   I don't believe that we had any activities

 1   going that far south. And is that west of the city?

 2   Q.   That's right where they're building the

 3   new dome or tearing down the old one.

 4   A.   Yeah, tearing down the old, building the

 5   new one.

 6   Q.   So, I mean, that's a major thoroughfare;

 7   would you agree?

 8   A.   I would agree.

 9   Q.   That was a major thoroughfare during the

10   Olympic games, right?

11   A.   I would agree.

12   Q.   The intersection we're talking about if

13   I'm at that intersection, I'm looking at the new

14   stadium, correct?

15   A.   Correct. If you look, I believe, north I

16   think that intersection is on a skew, but if you look

17   new north you would be looking at the new stadium.

18   Q.   Right. Okay. And before the new stadium

19   went in, what would I be looking at?

20   A.   The Georgia Dome.

21   Q.   The Georgia Dome. Okay. And that was

22   used in the Olympics, right?

23   A.   I can't -- I don't know. I can't say it

24   was or not.

25   Q.   It's been used for Falcons football --

1   A.   Absolutely.

2   Q.   -- for quite some time?

3   A.   Yes.

4   Q.   Does the City have a practice of, I guess,

5   regularly inspecting major intersections to make sure

6   they're compliant with the ADA?

7   A.   There's no proactive program to inspect

8   sidewalks or ADA -- intersections for ADA compliance.

9   MR. RADFORD: Let me stop for just a

10   second, can we make a copy of this?

11   MS. FLOYD: Yes.

12   MR. RADFORD: I want to make a copy and

13   put it in the record as an exhibit.

14   MS. FLOYD: Okay. Do you want to take a

15   break now so I can do that?

16   MR. RADFORD: Yeah, why don't we.

17   (Recess from 11:10 a.m. to 11:14 a.m.)

18   (Plaintiff's Exhibit 3 was marked for

19   identification.)

20   Q.   (By Mr. Radford) I'm handing you what I'm

21   now marking as Exhibit 3.

22   A.   Correct.

23   Q.   And I believe this is a document you

24   previously identified as a summary data sheet

25   regarding -- describe it to me, I know you already

1   have on the record.

2   A.   The sheet describes abstract data

3   associated with street resurfaces in 1992 up to 2009.

4   Q.   Okay. And I'm looking at column E and it

5   says number of ADA ramps?

6   A.   Right.

7   Q.   What would that column be showing us?

8   A.   In 1992 based on the streets that were

9   assessed they inventoried 547 ramps.

10   Q.   Okay. And the next ADA ramp, would that

11   be compliant?

12   A.   That would be compliant.

13   Q.   Okay. So out of that 547 in '92, they

14   determined 101 of them were ADA compliant?

15   A.   Correct.

16   Q.   And then the next column G, they

17   determined 266 were not compliant?

18   A.   That's correct.

19   Q.   And then column H, they determined 192

20   there was no ramp at all in the place where it should

21   be?

22   A.   Correct.

23   Q.   And that data is also complied with

24   respect to '93, '94, '95, and '96?

25   A.   Right.

1   Q.   Do you know where the ramps were

2 noncompliant or the ramps were missing? Do you know

3 for a fact whether they were repaired or installed?

4   A.   In looking at the data set -- the data

5 that this abstract came from it indicates that those

6 ramps were completed.

7   Q.   Now, from 1997 to 2007 there's no data in

8 the columns to show us the number of ramps, the number

9 that are incompliant, and the number not compliant,

10 et cetera; do you know why that is?

11   A.   I don't at this time. I haven't had time

12 to research that. The people I tried to contact were

13 either off or out of the country.

14   Q.   So would someone different be in custody

15 of the data that relates to '92 through '96 than the

16 data that relates to '97 through 2007?

17   A.   There could have been multiple people

18 responsible for various years. I haven't been able to

19 ascertain who those people are, you know, as of this

20 date.

21   Q.   And, again, I think you said there's a gap

22 in the data between 2010 and 2013?

23   A.   Correct.

24   Q.   But you are in possession of the data from

25 2013 to present day?

 1   A.   Correct.

 2   Q.   But neither of those sets are included

 3   in --

 4   A.   Correct.

 5   Q.   -- what we're looking at as Plaintiff's

 6   Exhibit 3, correct?

 7   A.   Correct.

 8   Q.   If we look back to the notice, topic five

 9   we asked for: The identification of all installation

10   of new sidewalk ramps in order to comply with the 2009

11   settlement.

12   Other than what we have here in

13   Plaintiff's Exhibit 3, can you speak on how many new

14   sidewalk ramps have been installed to comply with the

15   2009 settlement?

16   A.   Not specifically. I'd have to refer back

17   to my answer to question two, those five different

18   divisions I'd have to review the data that they have

19   to get a -- the data set that identifies, you know,

20   all those new sidewalk ramps.

21   Q.   Okay. So is it a fair statement that

22   you're not able to offer complete answers to some of

23   the questions that we've posed because there are

24   sources of that information you haven't had an

25   opportunity to consult yet?

```
 1        A.       Correct.

 2        Q.       Okay.  And then finally No. 6:  We asked

 3    that you speak on the City's position regarding why

 4    sidewalk ramps have not to date been installed at the

 5    intersection of Martin Luther King Boulevard and

 6    Centennial Olympic Park Drive.

 7               I think we discussed earlier that this was

 8    an old bridge, do you have something beyond that to

 9    say with respect to why sidewalk ramps have not been

10    installed at that intersection?

11        A.       In addition to, I also talked to our

12    bridge engineer.  One of the challenges with trying to

13    make repairs on a structure that's seven-years-old is

14    trying to find the documents, the plans of the bridge.

15    And we have -- he has been trying to research old

16    records.  We have several offsite locations that he's

17    been reviewing.

18               So the challenge is, you know, we don't

19    quite know how the sidewalks are either constructed.

20    We don't know if they're on the bridge deck proper or

21    if they're attached via some lever system.  So if

22    they're attached and you go to retrofitting them the

23    whole sidewalk may fall.

24               So those are some of the challenges.  So

25    securing the plans and if we can't find those plans
```

1   then we've got to do an extensive evaluation of the

2   structure to determine how it was constructed and what

3   we can do to retrofit that intersection for ADA ramps.

4   Q.   And I imagine just as a matter of business

5   or whatever, given that that intersection is going to

6   be part of the access to the new stadium, the City

7   would want that to be ADA compliant; would you agree?

8   A.   I would agree. I believe I recall the

9   conversation with our bridge engineer, Michael Ayo,

10   and I do believe that bridge is slated to be replaced.

11   So the actual date I'd have to defer to him.

12   Q.   Right.

13   A.   But we are looking at plans to replace

14   that bridge. We're currently working on the Spring

15   Street bridge. We had to do that bridge in two

16   phases. So all of those bridges are up, you can't

17   take multiple bridges out at the same time without

18   creating a mess. So they've, you know, staggered how

19   they handle that. So they're beginning work on the

20   Spring Street bridge and I think after that they'll

21   move on around the corner to Marietta bridge and then

22   the Centennial Olympic Park bridge.

23   Q.   And just to be clear, I think I've got on

24   my computer here an image, would you agree this is an

25   image of the intersection we're talking about --

1   A.   Yes, I would.

2   Q.   -- from a Google street view? And, again,

3 we're looking at the intersection of Martin Luther

4 King, Jr. and Centennial Olympic Park Drive, and the

5 islands, the concrete islands, and then the sidewalks

6 on the other side of the concrete islands, those are

7 what is lacking in the ramps, correct?

8   A.   Correct.

9   Q.   Are these islands themselves on the

10 bridge?

11   A.   That's one item we haven't been able to

12 determine if they were installed on the deck proper or

13 poured -- what we call a monolithic pour at the same

14 time. So without the plans we don't know specifically

15 without doing some more exploratory work.

16   Q.   Okay. Is it safe to say that at present

17 day there is no specific plan in place to install

18 sidewalk ramps at this intersection?

19   A.   No. Michael Ayo is actively investigating

20 options to put ramps at that location. He's consulted

21 contractors to come up with some ways we can do it. I

22 think he's pursuing a design build option if we can do

23 it that way. But the crux to all of this is that

24 there's a major concern with the age of this bridge

25 and doing work on it without some idea of how it's

1   constructed.

2   Q.   Okay. I guess these efforts to really get

3   serious about finding out ways to make this ADA

4   compliance has resulted from this lawsuit?

5   A.   I can't -- I don't know if they resulted

6   from this lawsuit.

7   Q.   Okay. Prior to this lawsuit, were you

8   aware of any specific discussions about making this

9   intersection ADA compliant?

10   A.   No, I am not.

11   Q.   So discussions you've had about it have

12   been in the context of this lawsuit, correct?

13   A.   Correct.

14   Q.   And part of the reason why they're wanting

15   to fix this is to resolve this lawsuit, correct?

16   A.   I would think they would want to fix it to

17   make it ADA compliant. There, again, I'd defer to

18   Michael, but I do believe there's plans to replace it.

19   And as part of those replacement plans they will

20   reconstruct the bridge so that it is.

21   Q.   And the plans to reconstruct the bridge

22   that is not just to make this ADA compliant, is it?

23   A.   Any time we rebuild bridges or install new

24   sidewalks it's an integral component, ADA compliance

25   is always an integral component of those construction

```
 1   activities.

 2       Q.      I understand.  There's other reasons they

 3   want to rebuild the bridge just beyond the ADA issue

 4   at this intersection, correct?

 5       A.      Yes.

 6       Q.      That would seem like a pretty expensive

 7   way to deal with the problem?

 8       A.      Yes.

 9               MR. RADFORD:  Okay.  I guess one thing I

10          want to say on the record is it sounds like

11          there's some information he wasn't able to get to

12          fully answer the questions, right?

13               So I do want to leave this open so once

14          some time has passed I would ask you to continue

15          to please try to gather the information.

16               MS. FLOYD:  Okay.

17               MR. RADFORD:  We want to reserve the right

18          to reopen it, come back and get full information.

19               MS. FLOYD:  Yeah, we agree to that.

20          That's fine.

21               MR. RADFORD:  Do we have any kind of

22          timeline as to when we're going to get discovery

23          responses from you guys.

24               MS. FLOYD:  We are working on that.  I'm

25          working diligently to get that.  I do not know
```

1   when I'll have an update, as soon as I do I'll be

2   in contact with you.

3   MR. RADFORD: Okay. And obviously all the

4   records we discussed today we want copies of

5   that.

6   MS. FLOYD: Yes.

7   MR. RADFORD: All right. Well, sir, I

8   appreciate your time today. And for now that's

9   it and we'll probably reconvene at some point,

10   but I think for today that's good.

11   MS. FLOYD: Okay. And we'll read and

12   sign.

13   (Deposition concluded at 11:26 a.m.)

14   (Pursuant to Rule 30(e) of the Federal

15 Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e),

16 signature of the witness has been reserved.)

17

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19

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25

1   CERTIFICATE OF COURT REPORTER

2

3   STATE OF GEORGIA:

4   COUNTY OF FULTON:

5

6   I hereby certify that the foregoing
    transcript was reported as stated in the caption and
7   the questions and answers thereto were reduced to
    writing by me; that the foregoing 51 pages represent a
8   true, correct, and complete transcript of the evidence
    given on Thursday, November 17, 2016, by the witness,
9   Lawrence Jeter, who was first duly sworn by me.

10   I certify that I am not disqualified
    for a relationship of interest under
11 O.C.G.A. 9-11-28(c); I am a Georgia Certified Court
    Reporter here as an independent contractor of
12 JPA Reporting, LLC who was contacted by
    James E. Radford, Esq., to provide court reporting
13 services for the proceedings; I will not be taking
    these proceedings under any contract that is
14 prohibited by O.C.G.A. 15-14-37(a) and (b) or
    Article 7.C. of the Rules and Regulations of the
15 Board; and by the attached disclosure form I confirm
    that neither I nor JPA Reporting, LLC are a party to a
16 contract prohibited by O.C.G.A. 15-14-37(a) and (b) or
    Article 7.C. of the Rules and Regulations of the
17 Board.

18   This 1st Day of December, 2016.

19

20

21   _____
         JENNIFER GOODRICH
22   CERTIFIED COURT REPORTER
         GEORGIA CERTIFICATE
23   NO. 5084-0657-3249-3312

24

25

1   DISCLOSURE OF NO CONTRACT

2

3   I, Lynn Pyles, do hereby disclose pursuant
   to Article 10.B of the Rules and Regulations of the
4 Board of Court Reporting of the Judicial Council of
   Georgia that JPA Reporting, LLC was contacted by the
5 party taking the proceedings to provide court
   reporting services for these proceedings and there is
6 no contract that is prohibited by O.C.G.A. 15-14-37(a)
   and (b) or Article 7.C. of the Rules and Regulations
7 of the Board for the taking of these proceedings.

8   There is no contract to provide reporting
   services between JPA Reporting, LLC or any person with
9 whom JPA Reporting, LLC has a principal and agency
   relationship nor any attorney at law in this action,
10 party to this action, party having a financial interest
   in this action, or agent for an attorney at law in
11 this action, party to this action, or party having a
   financial interest in this action. Any and all
12 financial arrangements beyond our usual and customary
   rates have been disclosed and offered to all parties.
13
            This 1st Day of December, 2016.
14

15

                    _____
16   LYNN PYLES, FIRM REPRESENTATIVE
                    JPA REPORTING, LLC
17

18

19

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24

25

1   DEPOSITION OF: LAWRENCE JETER /JPG

2   I do hereby certify that I have read all
questions propounded to me and all answers given by me

3   on November 17, 2016, taken before Jennifer Goodrich,
and that:

4

     1)   There are no changes noted.

5   2)   The following changes are noted:

6   Pursuant to Rule 30(e) of the Federal Rules of
Civil Procedure and/or the Official Code of Georgia

7   Annotated 9-11-30(e), both of which read in part: Any
changes in form or substance which you desire to make

8   shall be entered upon the deposition...with a
statement of the reasons given...for making them.

9   Accordingly, to assist you in effecting corrections,
please use the form below:

10

11   Page No.   Line No.   should read:

12   Reason for change:

13   Page No.   Line No.   should read:

14   Reason for change:

15   Page No.   Line No.   should read:

16   Reason for change:

17   Page No.   Line No.   should read:

18   Reason for change:

19   Page No.   Line No.   should read:

20   Reason for change:

21   Page No.   Line No.   should read:

22   Reason for change:

23   Page No.   Line No.   should read:

24   Reason for change:

25

```
 1   DEPOSITION OF:   LAWRENCE JETER /JPG

 2   Page No.        Line No.        should read:

 3   Reason for change:

 4   Page No.        Line No.        should read:

 5   Reason for change:

 6   Page No.        Line No.        should read:

 7   Reason for change:

 8   Page No.        Line No.        should read:

 9   Reason for change:

10   Page No.        Line No.        should read:

11   Reason for change:

12

13   If supplemental or additional pages are necessary,
     please furnish same in typewriting annexed to this
14   deposition.

15

16                      LAWRENCE JETER

17   Sworn to and subscribed before me,
     This the        day of            , 20   .
18

19   Notary Public
     My commission expires:
20

21

22   Please forward corrections to:

23                   JPA Reporting, LLC
         1776 Peachtree Street, N.W., Suite 390-N
24               Atlanta, Georgia 30309
                    404-853-1811
25
```

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